

REMARKS

The Examiner has objected to the drawings. In response, applicant has amended the specification to conform to the drawings. No new matter has been added.

The Examiner has rejected Claims 1-29 under 35 U.S.C. 102(e) as being anticipated by Maloney et al. (U.S. Patent No. 6,269,447). Applicant respectfully disagrees with this rejection, especially in view of the amendments made hereinabove.

Specifically, the Examiner has cited the following excerpts from Maloney to meet applicant's claimed "displaying a map of the trace utilizing the firewall:" (col. 11, lines 39-67 and col. 12, lines 1-2, as well as col. 4-11 and col. 12, lines 1-34). Such excerpts, however, fail to meet applicant's claimed "displaying a map of the trace utilizing the firewall" (emphasis added). In particular, there is no mapping of a trace, as specifically claimed, disclosed by Maloney.

To further distinguish Maloney in this regard and in the spirit of expediting the prosecution of the present application, applicant has amended each of the independent claims to require "displaying a world map with an illustration of the trace thereon utilizing the firewall" (emphasis added/or similar language).

Applicant asserts that simply nowhere in Maloney is there any disclosure, teaching or suggestion of the illustration of a trace on a world map for showing the geographical manner in which such trace traverses the world. In fact, applicant's claimed feature would have been unobvious in view of Maloney, since Maloney's visualizations are clearly "tree-based," as opposed to being based on any sort of "world map," as claimed. Thus, Maloney clearly *teaches away* from any sort of world map of a trace, as claimed by applicant. *In re Hedges*, 783 F.2d 1038, 228 USPQ 685 (Fed. Cir. 1986). Note the excerpt below from Maloney supporting such assertion.

\*As illustrated in FIG. 3 the discovery tool 12 is organized as a tightly coupled sensor/processor that is based on a suite of inter operable tools. These tools provide visualization, mapping, and analysis of incoming data and processed knowledge. The sensor manager tool 80 provides configuration and control of the sensors within the discovery tool 12 that allows data to be collected (local or remote sensors) without being transmitted to the discovery tool. Various aspects of the sensor manager tool 80 include providing a view of sensors sorted at a top level according to the host, collection of all sensor data within a category, enables transmission of data from sensors to the discovery tool, again by selected category, enables communication from a remote sensor to the discovery tool, adds a new (remote) host and associated sensors to the sensor management tool control.

The network viewer tool 82 provides auto-discovery, auto-layout, and automatic visualization of network nodes and links. Nodes are sources of computer traffic, and include servers, hosts and clients. Links are representations of end to end traffic, and may transfer to higher level network elements (such as routers). The network viewer tool 82 reads packet information and provides a physical picture of one or more logical networks. The logical picture displays nodes and links information and provides a physical picture of one or more logical networks. The logical picture displays node and link information aggregated for multiple packets. Inasmuch as network traffic (nodes and links) exists at many instances of the OSI network model (data link, etc.), effective visualization occurs by examining the source network at many different layers. In one embodiment of the network viewer tool 82 circles on a graph window represents nodes and lines represent communication links. As the discovery tool 12 automatically discovers more nodes, the count for each network appears on the graph window along with a network label. As the node representation is tree-based, the count is an aggregate of all nodes below the reference node. Information that is relevant to a node from the knowledge base 16 will be displayed in the window of the object viewer tool 84." (col. 7, line 40 - col. 8, line 13)

It is also noted that the Examiner's reference is further deficient in many other regards. For example, the Examiner has relied upon col. 5, lines 7 - 65 from Maloney to meet applicant's claimed "displaying a plurality of views," "wherein a geographical location of the network segments is displayed upon the selection of a first one of the views ... nodes of the network segments are displayed upon the selection of a second one of the views ... [and] a list of the network segments are displayed upon the selection of a third one of the views." See Claims 9-12 et al.

Such excerpt from Maloney, however, simply fails to meet such specific combination of three views, as claimed.

The Examiner is reminded that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. Of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Moreover, the identical invention must be shown in as complete detail as contained in the claim. *Richardson v. Suzuki Motor Co.* 868 F.2d 1226, 1236, 9USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. This criteria has simply not been met by the Maloney reference, especially in view of the amendments made hereinabove.

Applicant further emphasizes that additional amendments have been made to emphasize the foregoing features. Particularly, now claimed in Claim 29 is "wherein the trace is shown to involve a plurality of displayed network segments shown to be spanning different cities of different countries displayed on the world map." A notice of allowance or a specific prior art showing of such claimed features, in combination with the remaining claim elements, is respectfully requested.

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 505-5100. If any fees are due in connection with the filing of this paper, the Commissioner is authorized to charge such fees to Deposit Account No. 50-1351 (Order No. NAI1P094/02.013.01).

Respectfully submitted,

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